

As Executive Director of an International non-profit association with college and university housing officers as members, I am deeply concerned that the proposed regulations do not take into consideration the ways non-profit groups communicate with their members. If I understand the regulations, we could not fax a member a copy of the dues invoice even if they had requested it over the phone. Also, as primarily an institutional member association, it should be possible for the primary contact, in our case the housing director, to authorize fax communications for our educational program offerings and publications to all members of his/her staff. Also, the record keeping requirements in the new regulations would amount to another unfunded federal mandate. This regulation clearly needs a lot more study and modification. I urge your reconsideration and additional study before implementing. Thank you.